## Federal Defenders OF NEW YORK, INC.

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## BY ECF

Honorable Arun Subramanian United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

December 18, 2024

The application is GRANTED. Ms. Recinos' bail conditions shall be modified to permit travel to the Western District of Virginia ("WDVA").

SO ORDERED.

Re: United States v. Virginia Marisol Lemus Recinos 23 Cr. 464 (AS)

Dear Judge Subramanian:

Arun Subramanian, U.SD..J. Dated: December 18, 2024

I write to respectfully ask that the Court modify Ms. Lemus Recinos' bail conditions to permit her to travel to the Western District of Virginia ("WDVA"), which neighbors the Eastern District of Virginia ("EDVA"), where she resides. Neither the government nor Pretrial Services objects to this request.

Ms. Lemus Recinos has been on pretrial supervision in Manassas, VA since August 2023 with no violations. Her bail conditions restrict travel to EDVA, where Manassas is located, and the Southern and Eastern Districts of New York (and places between). However, as Manassas is geographically close to the border between the Eastern and Western Districts of Virginia, and Ms. Lemus Recinos has been offered a work opportunity in a nearby city located in WDVA, I write to ask that the Court modify her bail conditions to allow her to travel within WDNY.

As noted above, neither Pretrial Services nor the government opposes this request.

Respectfully submitted,

Hannah McCrea Assistant Federal Defender Hannah\_McCrea@fd.org

Counsel of Record CC: USPO Vakida J. Wilson